

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
CHUBB SEGUROS PERU S.A. a/s/o Ingram Micro
SAC and Saint Gobain Peru, S.A., INGRAM MICRO
SAC, SAINT GOBAIN PERU, S.A., XL CATLIN
SERVICES SE a/s/o Intcomex Peru SAC and
INTCOMEX PERU SAC

20-cv-3392 (ALC)

Plaintiffs,

against

NOTICE OF MOTION

M/V AS FORTUNA, her engines, boilers, etc., AS
FORTUNA OPCO B.V., JAS FORWARDING
SERVICES (IRELAND) LIMITED d/b/a Blue
World Line, SHIPCO TRANSPORT INC., and
ONBOARD LOGISTICS USA INC.,

Defendants.

-----X

PLEASE TAKE NOTICE that pursuant to leave granted by this Court's Order dated February 18, 2021 [Dkt # 52] and this Court's further Order dated February 19, 2021 setting a briefing schedule [Dkt # 54], Defendant JAS Forwarding Services (Ireland) Limited d/b/a Blue World Line (hereinafter "JAS Ireland"), by its attorneys Casey & Barnett LLC, will move before the Honorable Andrew L. Carter, Jr., U.S.D.J., at a time, date and location to be set by the Court, for an Order granting Summary Judgment in favor of JAS Ireland pursuant to Fed.R.Civ.P., Rule 56, dismissing JAS Ireland from this litigation with prejudice, and/or for such other and further relief as the Court may deem just and proper.

This Motion is supported by (1) the Declaration of Martin F. Casey, Esq., with accompanying exhibits; (2) the Declaration of Graeme Robinson, with accompanying exhibits; (3) the Declaration of Ingrid Velez with accompanying exhibits; (4) the Declaration of Joseph Tan with accompanying exhibits [filed by Shipco as Dkt # 60 which JS Ireland incorporates herein and

adopts as its own to the extent it is applicable to JAS Ireland]; (5) the accompanying Memorandum of Law, (6) the Memorandum of Law submitted by Shipco, [Dkt # 56], which JAS Ireland incorporates herein and adopts as its own to the extent it its applicable to JAS Ireland; and (7) JAS Ireland's Rule 56.1 Statement of Undisputed Facts.

Dated: New York, New York
March 1, 2021

CASEY & BARNETT, LLC
Attorneys for JAS Forwarding Services
(Ireland) Limited d/b/a Blue World Line

By: *Martin Casey*
Martin F. Casey, Esq.
305 Broadway, Ste 1202
New York, New York 10007
Tel: 212-286-0225
Fax: 212-286-0261
Email: mfc@caseybarnett.com